

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MARY THERESA CAHILL,)	
)	
Plaintiff,)	
)	
vs.)	No. 08 C 255
)	
SMITH & NEPHEW, INC.,)	District Judge Darrah
)	
Defendant.)	Magistrate Brown

NOTICE OF DEPOSITION

To: Kay L. Schichtel
Anthony M. Monaco
Swanson, Martin & Bell, LLP
330 N. Wabash St., Ste. 3300
Chicago, IL 60611

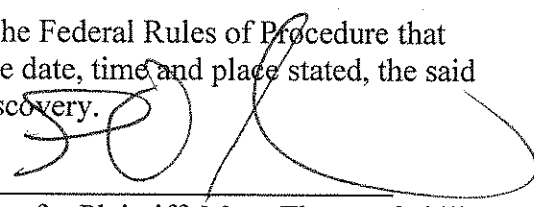
DEPONENT: David Kelman

You are hereby notified that the undersigned will take the deposition of the above-named deponent before a Notary Public or any other duly authorized officer in the State of Illinois on:

DATE: July 25, 2008 TIME: 1:00 p.m.

ADDRESS: 200 S. Wacker Dr., 22nd Floor, Chicago, Illinois 60606

You are hereby further notified pursuant to the Federal Rules of Procedure that you are by this Notice required to have present at the date, time and place stated, the said deponent for oral examination for the purpose of discovery.



Attorney for Plaintiff, Mary Theresa Cahill

Eric D. Stubenvoll
Fisher Kanaris, P.C.
200 S. Wacker Dr., 22nd Floor
Chicago, IL 60606
(312) 474-1400
(312) 474-1410 (fax)
ARDC# 6212104

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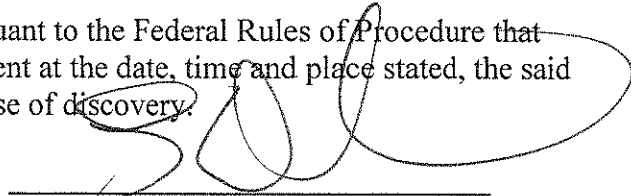
DEPONENT: Dennis Watson

You are hereby notified that the undersigned will take the deposition of the above-named deponent before a Notary Public or any other duly authorized officer in the State of Illinois on:

DATE: July 25, 2008 TIME: 9:30 a.m.

ADDRESS: 200 S. Wacker Dr., 22nd Floor, Chicago, Illinois 60606

You are hereby further notified pursuant to the Federal Rules of Procedure that you are by this Notice required to have present at the date, time and place stated, the said deponent for oral examination for the purpose of discovery.



Attorney for Plaintiff, Mary Theresa Cahill

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NOTICE OF TAKING DEPOSITION
PURSUANT TO FED.R. CIV P. 30(b)(6)


PLEASE TAKE NOTICE that pursuant to Fed.R. Civ. P. 30(b)(6), Plaintiff, Mary Theresa Cahill, will take the deposition, before a qualified notary public by oral examination, of the corporate designee(s) of Defendant, Smith & Nephew, Inc., on **July 30, 2008 at 9:30 a.m.** commencing at Fisher Kanaris, P.C., 200 S. Wacker Dr., 22nd Floor, Chicago, Illinois 60606. The deposition will continue until adjournment.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), Smith and Nephew, Inc.'s corporate designee(s) shall be prepared to testify regarding the following subjects:

- 1) The design of the model hip at issue, including any changes to that design, from 1996 to the present;
- 2) Any regulatory approval of the design, manufacture or sale of the model hip at issue;
- 3) The manufacture of the hip at issue in this litigation, including the dates of manufacture and any specifications and instructions applicable to the manufacture of the hip;
- 4) Inspection and testing of the hip at issue in this litigation prior to the time of sale;
- 5) The sale of the hip at issue in this litigation;

- 6) Instructions and warnings regarding the model hip at issue in this litigation;
- 7) Instructions and warnings regarding the specific hip at issue in this litigation;
- 8) Any inspection of the hip at issue by Smith & Nephew, Inc. or any expert or consultant, after December 1, 2006;
- 9) Smith and Nephew, Inc.'s responses to Plaintiff's discovery requests;
- 10) Any investigation by Smith & Nephew, Inc. of its representatives regarding Mrs. Cahill's claim or the reason her Echelon hip failed; and
- 11) Any other claims of defects or fractures of Echelon hips or similar model hips manufactured and/or sold by Smith & Nephew, Inc.

MARY THERESA CAHILL



*One of the attorneys for Plaintiff,
Mary Theresa Cahill*

Eric D. Stubenvoll
Fisher Kanaris, P.C.
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CERTIFICATE OF SERVICE

To: Kay L. Schichtel
Swanson, Martin & Bell, LLP
330 North Wabash Avenue, Ste. 3300
Chicago, IL 60611
312-321-0990 (fax)

Crystal A. Kettenbeil, after being duly sworn, deposes and says that a copy of the following pleading(s)/documents were served on all counsel of record by facsimile and depositing same in the U.S. Mail, proper postage prepaid, at 200 S. Wacker Drive, Chicago, Illinois on July 9, 2008:

- Notice of Taking Deposition Pursuant to Fed.R. Civ. P. 30(b)(6)
- Notice of Deposition- David Kelman
- Notice of Deposition- Dennis Watson


Crystal A. Kettenbeil

Subscribed and Sworn to
before me this 9th day
of July, 2008


NOTARY PUBLIC

